

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

_____)	
JANE DOE,)	
)	
Plaintiff,)	Case No. 3:23-cv-00018-RSB
)	
v.)	<u>JURY TRIAL DEMANDED</u>
)	
RECTOR AND VISITORS OF THE)	
UNIVERSITY OF VIRGINIA,)	
)	
Defendant.)	
_____)	

PLAINTIFF'S SUPPLEMENTAL INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1), Plaintiff, by counsel, makes the following supplemental initial disclosures.

I. PLAINTIFF'S ADDITIONAL WITNESSES

1. Palma Pustilnik
800-390-9983
c/o Central Virginia Legal Aid Society, 103 East Water Street, Suites 201 & 202,
Charlottesville, VA 22901
Pustilnik is expected to have information related to Plaintiff's claims and damages.
2. Andrew Verzilli
(215) 368-7797
411 North Broad Street, Lansdale, PA 19446
Verzilli is expected to have information related to Plaintiff's damages.
3. Plaintiff's Father
c/o Plaintiff's counsel
Plaintiff's Father is expected to have information related to Plaintiff's damages.
4. Arya Royal
c/o Plaintiff's counsel
Royal is expected to have information rebutting assertions made by Akia Haynes
Hale during her deposition and regarding her credibility.

5. Dr. Katherine Sznajder
240-906-6500
5620 Ager Road, Hyattsville, MD 20782
Dr. Farahani is expected to have information related to Plaintiff's damages.
6. Dr. Farimah Farahani
703-934-5700
12255 Fair Lakes Pkwy Fairfax, VA 22033
Dr. Farahani is expected to have information related to Plaintiff's damages.
7. John Roe
John Roe Telephone
c/o attorney Rhonda Quagliana, 310 4th Street NE, P.O. Box 298, Charlottesville, VA 22902
John Roe is expected to have information rebutting assertions made by Parwiz Esmati and regarding his credibility.
8. Ana Cisneros
(202) 279-0748
c/o Immigration Counsel PLLC, 1150 Connecticut Ave. N.W., Suite 325, Washington, DC 20036
Cisneros is expected to have information regarding the credibility of Parwiz Esmati and Paul Haar and rebutting assertions made by Parwiz Esmati during his deposition.
9. Marpu Kurban
(202) 823-6406
1202 S. Ross St., Apt 2225, Arlington, VA 22204
Kurban is expected to have information regarding the credibility of Parwiz Esmati and Paul Haar and rebutting assertions made by Parwiz Esmati during his deposition.
10. Farkhunda Paimani
8350 Greensboro Dr., Apt. 307, McLean, VA 22102
Paimani is expected to have information regarding the credibility of Parwiz Esmati and Paul Haar and rebutting assertions made by Parwiz Esmati during his deposition.
11. Kristin Zech
(703) 940-3788
8300 Greensboro Drive, Suite 1250, McLean, VA 22102
Zech is expected to have information regarding the credibility of Parwiz Esmati.

Dated: September 10, 2024

Respectfully Submitted,

/s/Elizabeth K. Abdnour

Elizabeth K. Abdnour

Pro. Hac Vice

Abdnour Weiker LLP

500 E. Michigan Ave., Suite 130

Lansing, Michigan 48912

(517) 994-1776

liz@education-rights.com

Devon J. Munro (VSB # 47833)

Munro Byrd, P.C.

120 Day Ave. SW, First Floor

Roanoke, Virginia 24016

(540) 283-9343

dmunro@trialsva.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document has been served on all parties via counsel of record by electronic mail this 10th day of September, 2024.

/s/Elizabeth K. Abdnour
